

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

U.S. SECURITIES AND  
EXCHANGE COMMISSION,

*Plaintiff,*

vs.

VUUZLE MEDIA CORP.,  
RONALD SHANE FLYNN, AND  
RICHARD MARCHITTO,

*Defendants.*

Case No. 2:21-cv-1226-KSH-CLW

Hon. Katherine S. Hayden

Mag. J. Cathy L. Waldor

**ORAL ARGUMENT REQUESTED  
MOTION DAY: April 4, 2022**

---

**APPEAL NOTICE OF MAGISTRATE JUDGE'S OPINION AND ORDER  
(ECF NO. 82) TO DISTRICT COURT UNDER L.CIV.R 72.1(c)(1)(A)**

**DICKINSON WRIGHT, PLLC**

/s/ Melissa A. Alcantara

Melissa A. Alcantara, Esq.

(NJ Attorney ID No. 014002004)

Jacob S. Frenkel, Esq.

Seth B. Waxman, Esq.

Aimee R. Gibbs, Esq.

1825 I Street, Suite 900

Washington, DC 20006

Tel. (202) 466-5953

malcantara@dickinsonwright.com

jfrenkel@dickinsonwright.com

swaxman@dickinsonwright.com

agibbs@dickinsonwright.com

*Attorneys for Vuuzle Media Corp.*

Defendant Vuuzle Media Corp., through its counsel Dickinson Wright PLLC, brings this Notice of Appeal pursuant to L.Civ.R. 72.1(c)(1)(A), and in support thereof, states as follows:

1. On July 16, 2021, Plaintiff, United States Securities Exchange Commission (SEC), filed a Motion for Entry of Protective Order (ECF No. 41).

2. On July 27, 2021, Defendant, Vuuzle Media Corp. (Vuuzle), filed a Brief in Opposition to SEC's Motion for Entry of Protective Order (ECF No. 43).

3. On July 29, 2021, SEC filed a Reply Brief in Support of its Motion for Entry of Protective Order (ECF No. 44).

4. On October 12, 2021, Magistrate Judge Cathy L. Waldor heard oral argument on the Motion for Entry of Protective Order. A copy of the transcript from the hearing is annexed to this Motion and the accompanying Brief in Support.

**Exhibit A.**

5. On January 19, 2022, Magistrate Judge Cathy L. Waldor heard oral argument on the Motion for Entry of Protective Order. A copy of the transcript from the hearing is annexed to this Motion and the accompanying Brief in Support.

**Exhibit B.**

6. Thereafter, on February 14, 2022, the Magistrate Judge issued an Opinion and Order (ECF No. 82) that granted in part, and denied in part, SEC's Motion for Entry of Protective Order.

7. For the reasons set forth in the accompanying Brief in Support, the Magistrate Judge's Opinion and Order should be vacated or modified.

8. This Notice of Appeal is timely under L.Civ.R. 72.1, as it has been filed within 14 days of the Magistrate Judge's Order on a Non-Dispositive Motion.

**CERTIFICATE OF SERVICE**

I certify that on February 28, 2022, I filed the foregoing Motion and the attached Brief in Support using this Court's ECF filing system, which caused notice to be issued to all counsel of record.

/s/ Melissa A. Alcantara  
Melissa A. Alcantara, Esq.  
(NJ Attorney ID No. 014002004)  
Jacob S. Frenkel, Esq.  
Seth B. Waxman, Esq.  
Aimee R. Gibbs, Esq.  
1825 I Street, Suite 900  
Washington, DC 20006